

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HUIZHAN CHEN,

Plaintiff,

v.

ADEDIY AND THE OTHER INDIVIDUALS,
PARTNERSHIPS, AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED IN SCHEDULE
“A”

Defendants.

Case No.: 2:24-cv-01516-WSS

**DECLARATION OF XIYAN ZHANG IN SUPPORT OF
PLAINTIFF’S REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANTS
NOS. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27,
28, 29, 30, 31 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54,
55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80,
81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92 AND 93**

I, Xiyang Zhang, swear under penalty of perjury, and state as follows:

1. I certify that I am over the age of eighteen, of sound mind, and capable of making this Affidavit.
2. I have never been convicted of a felony or any criminal offense involving moral turpitude.
3. I have personal knowledge of every statement made herein and such statements are true and correct.
4. I am counsel of record, for Huishan Chen (“Chen” or “Plaintiff”) in this action
5. I am an attorney in good standing in this Court and licensed to practice in the State of New York since 2013.

6. I make and submit this Affidavit in support of Plaintiff's Request for Entry of Default (hereinafter "Request for Entry of Default") against those Defendants Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92 and 93 (as noted in further detail in Schedule "A" attached hereto) for failure to answer or otherwise respond as provided by the Federal Rules of Civil Procedure.

7. Pursuant to this Court's Order For Authorization To Perform Electronic Service Of Process Under Fed. R. Civ. P. 4(f)(3) (ECF 20), on December 5, 2024, I caused all Defendants in this action to be served via email with copies of the following:

- Complaint For Damages And Injunctive Relief (ECF 2);
- (1) Temporary Restraining Order; (2) Order Restraining Defendants' Assets And Online Storefronts; (3) Order To Show Cause Why A Preliminary Injunction Should Not Issue; And (4) Order Authorizing Expedited Discovery (ECF 18);
- Summons in A Civil Action (ECF 24);
- Order For Authorization To Perform Electronic Service Of Process Under Fed. R. Civ. P. 4(f)(3) (ECF 20); and
- Order To Seal (ECF 3).

8. In my December 15 and December 24, 2024 service emails, I attached PDF copies of the documents referenced above in Paragraph 7 and also provided a link (because the case was sealed at that time) to an online repository containing copies of all documents filed and all discovery served in this action.

9. Further to the above, on January 11, 2025, I caused all Defendants in this action to be served via email with copies of the Preliminary Injunction Order (ECF 26).

10. The email addresses used to serve each Defendant with the aforementioned materials were provided by the Online Marketplaces (Amazon.com, Wal-Mart.com and Alibabab.com).

11. As of December 24, 2024, all Defendants identified in Schedule “A” to the Complaint were confirmed served by email (with no reported delivery failures).

12. The deadline for the Defendants Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92 and 93 to answer or otherwise respond to the Complaint was January 14. Defendants Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92 and 93 have not answered or otherwise responded. The time for these Defendants to answer or otherwise respond has not been extended.

13. As of the filing of Plaintiff’s Request for Entry of Default, none of the Defendants answered the Complaint, otherwise responded to the Complaint, or appeared in this Action.

I, Xiyan Zhang, swear under penalty of perjury under the law of the United States of America that the foregoing is true and correct to the best of my personal knowledge.

Executed this 15th day of January, 2025

/Xiyan Zhang/
Xiyan Zhang
Stratum Law LLC
2424 E. York St. Ste. 233
Philadelphia, PA, 19125
Phone# (215) 395-8756
Bar# 5052642
Email: xzhang@stratumlaw.com

Attorney for Plaintiff Huishan Chen